

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA                  )  
  )  
Plaintiff,                                  )  
  )  
v    ) No. 00-199-02-CR-W-NKL  
  )  
STEPHEN V. SANDERS                         )  
  )  
Defendant.                                  )

**MOTION TO EXTEND DEFENDANT S  
INCARCERATION REPORTING DATE FROM  
JANUARY 13, 2003 TO MARCH 17, 2003**

COMES NOW defendant, by counsel, and moves the Court to enter an Order extending defendant s date to report to commence his 32 month sentence from January 13, 2003 to March 17, 2003.

**SUGGESTIONS IN SUPPORT**

The following matters require defendant s attention and involvement prior to reporting to serve his sentence:

1. Complete information for the preparation of federal taxes will not be available until some time in February, 2003. The sale of defendant s California house is scheduled for December 20, 2002. Since 1994, defendant has been audited by the I.R.S. and tax counsel, Thomas R. Raithel, Esq., anticipates the same and joins in defendant s request for this extension.
2. Lois Sanders, defendant s 91 year old grandmother, is hospitalized with a broken arm and pelvis. Surgery was performed on December 5, 2002. Thereafter, rehabilitation will take

place for 21 days and suitable housing must be then be located for her since she cannot live alone.

3. Stephen Sanders, defendant s 12 year old son, is having a difficult school year; has been suspended five times. The school believes his medication for ADHD is no longer working. His father, because of mother s absence, is best equipped to provide assistance. Bi-polar disorder is now suspected and testing to determine the same is underway.

4. Mary Sanders will not be released from her present confinement until January 6, 2003. Because of this, she has not attended school functions, teachers meetings nor performed typical parental duties. Thus, Defendant feels it is appropriate for them to have a reasonable time to facilitate the transition from defendant s sole care to Mary s.

5. The earning potential for Mary Sanders, together with the Sanders present financial status is as follows:

#### **EMPLOYMENT**

Mary Sanders is currently employed at a law firm earning approximately \$1,100.00 per month. She has employment as a Mortgage Loan Officer to start in mid to late January. Her income potential would be approximately \$4,000.00 per month after the first 30 days. This will be sufficient income, but she will not be earning this until late February, early March. Unfortunately, there is no buffer to support her in Defendant s absence. As a convicted felon and without the financial backing to start her own business, this is the best opportunity available at this time. The halfway house and home confinement have only helped to further set back progress in Mary s case. According to BOP policy, you can be employed in no more than a 40 hour work week and the regular check-up calls by the halfway house only succeed in annoying the employer. In order to produce the necessary income, Mary must work a minimum of 60

hours per week.

**FINANCIAL STATUS**

**Current Liabilities**

Credit Lines (left over from real estate business)	\$35,000.00
Home Equity Line	\$25,000.00
Missouri State Taxes	\$10,000.00
Misc. Credit	<u>\$20,000.00</u>
<b>Total Liabilities</b>	<b>\$90,000.00</b>

**Current Assets**

1994 Infinity	\$ 6,000.00
Wedding Ring	\$20,000.00
Equity in Real Estate	<u>\$50,000.00</u>
<b>Total Assets</b>	<b>\$76,000.00</b>

**Monthly Expenses**

House Payment, Insurance and Taxes	\$ 2,000.00
Utilities	\$ 500.00
Food, Clothing, Child Care	\$ 1,000.00
Gasoline, Insurance	\$ <u>350.00</u>
<b>Total Expenses</b>	<b>\$ 3,850.00</b>

**WHEREFORE**, for the reasons above-stated, defendant respectfully moves the Court to extend his incarceration reporting date from January 13, 2003 to March 17, 2003.

RESPECTFULLY SUBMITTED,

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/s/ Will Bunch  
WILL BUNCH #19527  
P. O. Box 28218  
Kansas City, Missouri 64118  
(816) 468-7266  
Facsimile (816) 468-7266

**CERTIFICATE OF SERVICE**

**I CERTIFY** that a copy of the above and foregoing was sent by FAX this 23<sup>rd</sup> day of December, 2002, to: Catherine Connelly, Assistant U. S. Attorney, 426-5186; and to: Stephanie J. Dumolt, Probation Officer, 512-1313.

/s/ Will Bunch

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WILL BUNCH